

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: Vale S.A. Securities Litigation

Case No. 15 Civ. 09539 (GHW)  
Consolidated with Case No. 16 Civ.  
00658 (GHW)

**CLASS ACTION**

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF SETTLEMENT  
AND APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that based on the Stipulation and Agreement of Settlement dated February 5, 2020 (the “Stipulation”), attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs Alameda County Employees’ Retirement Association and Orange County Employees Retirement System (“Lead Plaintiffs”) hereby move this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for attorneys’ fees and expenses.<sup>1</sup> The Parties’ agreed-upon [Proposed] Order Preliminarily Approving Settlement and Authorizing Dissemination of Settlement Notice is submitted with this motion. Defendants do not oppose the Motion, in accordance with the terms of the Stipulation.

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

Dated: February 7, 2020

Respectfully submitted,

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-and-

/s/ John C. Browne

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